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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KATHRYN MAYORGA,

Plaintiff,

vs.

CRISTIANO RONALDO,

Defendant.

Case No. 2:19-cv-00168-JAD-DJA

**STIPULATION AND ORDER TO
SEAL ATTORNEY-CLIENT
PRIVILEGED AND ATTORNEY
WORK-PRODUCT DOCUMENTS
ATTACHED TO PLAINTIFF'S
OPPOSITION TO MOTION TO
COMPEL ARBITRATION [ECF 44]**

Pursuant to Local Rules IA 6-2, and LR IA 10-5, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Kathryn Mayorga, through her attorney Leslie Mark Stovall, Esq., and Defendant Cristiano Ronaldo, through his attorneys, Peter S. Christiansen, Esq., Kendele L. Works, Esq. and Keely A. Perdue, Esq., that documents attached to Plaintiff's Opposition to Defendant's Motion to Compel Arbitration [ECF 44] within Exhibits 4-5 and identified as Bates Nos. 0003-0257 (hereinafter "Documents 0003-257"), and all references to those documents, remain sealed pending a judicial determination as to whether such documents

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1 should be entirely stricken from the record in this case because they are subject to the protections
2 of the attorney-client privilege and attorney work-product doctrines.

3 Plaintiff filed her Opposition to the Motion to Compel Arbitration entirely under seal.
4 However, the Parties anticipate that pursuant to this Court's Order re: Motions to Dismiss, Exceed
5 Page Limits, and Seal Judicial Records [ECF 23], the Court may require Plaintiff to refile her
6 Opposition with only quotations to the settlement agreements between the parties being sealed
7 and/or redacted. While Plaintiff and Defendant disagree regarding whether Documents 0003-
8 0257 should be stricken from the record and that issue was not before the Court in ECF 23, both
9 parties stipulate and respectfully request that those documents and all references to the material
10 contained in those documents, be maintained under seal pending a judicial determination of the
11 application of the attorney-client privilege and work-product doctrines.

12 Plaintiff represents that Documents 0003-0121 and 0121 and 0175-0275 are documents
13 that Plaintiff's Counsel received from "Football Leaks" pertaining to Defendant [Mr. Ronaldo].
14 Plaintiff represents that Documents 0122 – 0174 are news publications that Plaintiff's Counsel
15 provided to the Las Vegas Metropolitan Police Department. Defendant asserts Documents 0003-
16 0257 consist almost entirely of what purport to be communications among counsel and/or
17 investigators for Mr. Ronaldo, as well as internal communications among counsel, attorney work-
18 product and attorney-client communications and/or the unlawful publication of purported
19 attorney-client communications and attorney work-product. While Mr. Ronaldo does not believe
20 such documents are without alteration, he nevertheless has never agreed to waive any of the
21 protections of the attorney-client privilege or attorney work product doctrine.

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Accordingly, Mr. Ronaldo intends to move, pursuant to Rules 104 and 502 of the Federal Rules of Evidence, to have Documents 0003-0257 and all references thereto, entirely stricken from the record. Plaintiff intends to oppose, arguing that exceptions to such privileges apply. Both parties agree that Documents 0003-0257 and any references thereto, should remain sealed pending a judicial determination regarding the application of the attorney-client privilege and attorney work product doctrines.

Dated this 1st day of October, 2019.

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/s/ Keely A. Perdue, Esq.

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Dated this 1st day of October, 2019.

STOVALL & ASSOCIATES

/s/ Leslie Mark Stovall, Esq.

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Attorneys for Plaintiff Kathryn Mayorga

ORDER

IT IS SO ORDERED.

DATED this ____ day of _____, 2019.

U.S. DISTRICT COURT JUDGE